



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

ACTION MEMORANDUM TO CONTINUE RESPONSE ACTIONS

SUBJECT: Action Memorandum to Request Ceiling Increase for a Removal Action at the Fairfax Street Wood Treater Site

FROM: Rick Jardine, OSC *Am J/ML 270-510*
Emergency Response Section

THRU: Matt Taylor, Chief, Emergency Response Section *MT*
Shane Hitchcock, Chief, ERRB *SH*

TO: Franklin Hill, Director *F.H. 10/28/2010*
Superfund Division

I. PURPOSE

The purpose of this memorandum is to request a ceiling increase for the subject site to allow for continued emergency response action.

II. SITE CONDITIONS AND BACKGROUND

The emergency removal action was initiated on August 10, 2010. The original Emergency Action Memorandum for this site was signed on September 8, 2010 and is attached to this document. Please refer to the original Action Memorandum for details regarding the site conditions.

Actions completed to date include capturing all storm water that has flowed through the process area of the facility, pressure washing the drip pad, sump, and majority of the secondary containment structure, and drumming sludges removed from the process area. Captured contaminated stormwater is being stored in the facility storage tanks and rented frac tanks. Treatment of the contaminated water began on October 26, 2010 with several thousand gallons successfully treated thus far.

Rainfall continues to be an issue as several tropical depressions and seasonal thunderstorms continue to affect the Site. The volume of stormwater now captured is more than double the initial amount of contact water found on site. Due to the decontamination of the process area, the contaminant loading of the stormwater has been reduced; however, more sludge needs to be removed. The additional sludge is located in tight spaces beneath and between the tanks and side walls of the secondary containment structure. To adequately complete the decontamination of the process areas the tanks must be removed.

The ceiling increase will allow the removal crew to continue to treat the stored water and discharge it to the POTW; thereby freeing up the rented frac tanks. Further, the additional funding will allow responders to physically remove the tanks and accomplish a more thorough decontamination of the process area.

The worst case scenario should the ceiling increase not be granted would be a return to original conditions with contaminated storm water flowing off site and into Moncrief Creek.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT

The threats currently presented by the site are unchanged from those identified in the original Action Memorandum.

IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances from this site, if not addressed by implementing the response action selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, or welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

The proposed actions for this Site remain true to the objectives identified during the initial stages of the emergency: halt the flow of contaminated storm water from the process area of the site and reduce potential contaminant loading of future storm water. To accomplish these objectives two major tasks have been identified. First, continue to capture stormwater, treat it on site, and discharge treated water to the POTW. Second, remove the facility storage tanks and conduct a more thorough decontamination of the tanks and containment structure.

<u>Extramural Costs*</u>	<u>Current Ceiling</u>	<u>Proposed Inc.</u>	<u>Proposed Ceiling</u>
<u>Regional Allowance Costs:</u>			
ERRS	\$200,000	\$350,000	\$550,000
<u>Other Non-Regional Costs:</u>			
START	<u>\$ 30,000</u>	<u>\$ 10,000</u>	<u>\$ 40,000</u>
Subttl Extramural Costs:	\$230,000	\$360,000	\$590,000
Extramural Contingency	\$ 20,000	\$ 25,000	\$ 45,000

TOTAL, REMOVAL	\$250,00	\$385,00	\$635,000
PROJECT CEILING			

*EPA direct and indirect costs, although cost recoverable, do not count toward the Removal Ceiling for this removal action. Liable parties may be held financially responsible for costs incurred by the EPA as set forth in Section 107 of CERCLA. "

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

A delay in action or no action at this Site would increase the actual or potential threats to the public health and/or the environment.

VII. OUTSTANDING POLICY ISSUES

None

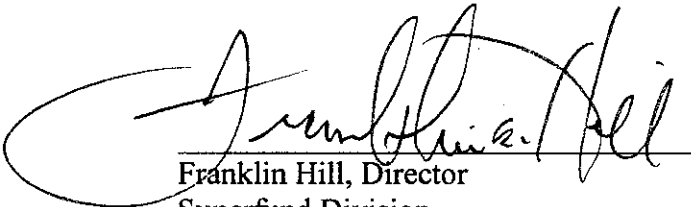
VIII. ENFORCEMENT

Please refer to the Enforcement Addendum for information regarding enforcement.

IX. RECOMMENDATION/APPROVAL

This decision document represents the selected removal action for this Site, developed in accordance with CERCLA as amended, and not inconsistent with the National Contingency Plan. This decision is based on the administrative record for the Site.

Conditions at the site meet the NCP section 300.415(b) criteria for a removal action, and I recommend your approval of the proposed ceiling increase to allow completion of the action. The total project ceiling, if approved, will be \$635,000.


Franklin Hill, Director
Superfund Division

10/29/2010
Date